

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA)	
)	Criminal No. 20-074-MSM
v.)	
)	
DAVID STAVELEY,)	
Defendant.)	

**GOVERNMENT’S OPPOSITION TO DEFENDANT’S
MOTION TO STRIKE**

In his latest motion, defendant David Staveley (“Staveley”) moved this Court (ECF #102) to strike the Government’s Opposition to his prior motion to return his Massachusetts driver’s license and to remove the undersigned from this proceeding. Defendant’s frivolous motion should be denied.

Defendant’s instant motion relates to his prior motion that the Government return to him his driver’s license. That license has now been returned to defendant’s mother. As indicated in the Government’s Response to Defendant’s Return of Property, the undersigned was advised by the FBI that the Massachusetts State Police had the license in its possession and the State Police had made multiple attempts to return it to defendant’s mother that were unsuccessful. The undersigned has no first-hand knowledge of these efforts and was simply advising the Court of information it received from law enforcement. Defendant’s reckless allegation that the undersigned has been untruthful with the Court should be rejected and defendant should be advised of the consequences of filing frivolous pleadings, including possible sanctions under Federal Rule Civil Procedure 11.

For the foregoing reasons, defendant’s motion should be denied.

Respectfully submitted,

ZACHARY A. CUNHA
UNITED STATES ATTORNEY



LEE H. VILKER
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October 2022, I caused the within Government's Opposition to be filed electronically and it is available for viewing and downloading from the ECF system. I also certify that this Opposition has been mailed to:

David Staveley
Reg. No. 04230-049
FMC Devens – Camp
P.O. Box 879
Ayer, MA 01432

/s/ Lee H. Vilker

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